

FEB 19 2025

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DEPUTY CLERKUNITED STATES DISTRICT COURT  
MIDDLE DISTRICT OF PENNSYLVANIA

UNITED STATES OF AMERICA : No. 1:25-CR-50  
:   
v. : (Judge Mannion )  
NOEL CHINCHILLA-AVILEZ, :   
:   
Defendant. :

**INDICTMENT****THE GRAND JURY CHARGES:**

**COUNT 1**  
8 U.S.C. § 1253(a)(1)(A)  
(Failure to Depart)

From in or around February 2023, through on or about February 14, 2025, in York County, Pennsylvania, within the Middle District of Pennsylvania, and elsewhere, the defendant,

**NOEL CHINCHILLA-AVILEZ,**

being a deportable alien against whom a final order of removal was outstanding pursuant to Title 8, United States Code, Section 1227(a), did willfully fail and refuse to depart from the United States within a period of ninety (90) days from the date of the final order of removal under administrative processes.

In violation of Title 8, United States Code, Section 1253(a)(1)(A).

**COUNT 2**  
8 U.S.C. § 1253(a)(1)(C)  
(Hindering Removal)

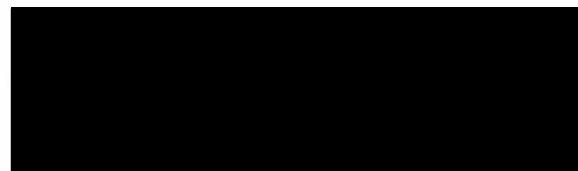
On or about February 14, 2025, in York County, Pennsylvania, within the Middle District of Pennsylvania, the defendant,

**NOEL CHINCHILLA-AVILEZ,**

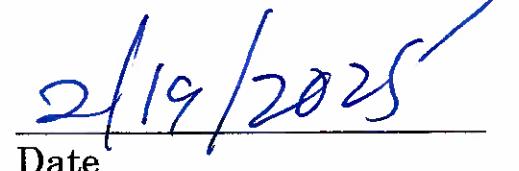
an alien against whom a final order of removal is outstanding, by reason of being a member of any of the classes described in 8 U.S.C. § 1227(a), did connive, conspire, and take any other action, designed to prevent and hamper and with the purpose of preventing and hampering his departure from the United States.

In violation of Title 8, United States Code, Section 1253(a)(1)(C).

A TRUE BILL

A large black rectangular redaction box covering a signature.

FOREPERSON

A handwritten signature in blue ink that reads "2/19/2025".  
\_\_\_\_\_  
Date

JOHN C. GURGANUS  
Acting United States Attorney

A handwritten signature in blue ink that reads "Scalera".  
\_\_\_\_\_  
MICHAEL SCALERA  
Assistant United States Attorney